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12 SONOMA COUNTY JUNIOR COLLEGE DISTRICT
13 (Sued Erroneously herein as SANTA ROSA JUNIOR COLLEGE)
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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

18 JOSIE KOCH,
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20 Plaintiff,
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22 v.
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24 SANTA ROSA JUNIOR COLLEGE, and
25 DOES 1 through 20, inclusive,
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27 Defendants.
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Case No. 3:13-cv-04512-WHO

**STIPULATION TO EXTEND DISCOVERY
DEADLINES; ORDER**

Hon. William H. Orrick

STIPULATION

Defendant SONOMA COUNTY JUNIOR COLLEGE DISTRICT and plaintiff JOSIE KOCH by and through their respective attorneys of record, hereby stipulate as follows:

1. By order dated January 30, 2014 the Settlement Conference before Magistrate Judge Maria-Elena James was set for June 10, 2014. By subsequent order dated January 30, 2014 the Settlement Conference was continued to June 27, 2014.

2. Pursuant to the Court's Civil Pretrial Order issued on March 3, 2014 the following discovery and dispositive motion deadlines were set:

- (a) Discovery to be completed by 11/14/2014;
- (b) Expert disclosure to be served by 12/5/2014;
- (c) Expert rebuttal to be served by 12/19/2014;
- (d) Expert Discovery to be completed by 1/23/2015;
- (e) The Court shall hear dispositive motions no later than 3/4/2015;
- (f) Pretiral Confernece to take place one 5/11/2015; and
- (g) Trial is scheduled for 6/1/2015.

3. The parties have submitted a stipulation to Settlement Conference Magistrate Judge Maria-Elena James, to have the Settlement currently set for June 27, 2014 rescheduled to September 26, 2014. The parties have respectfully requested that the Settlement Conference be rescheduled in order to permit the parties to engage in required pre-conference discovery which has been delayed due to prior defense counsel's unavailability due to the recent birth of her child. Absent a rescheduling, the parties will be unable to meaningfully participate in the conference.

4. For all the good cause stated above, the parties respectfully request this Court extend the currently set discovery deadlines as set forth below:

- (a) Discovery to be completed by 1/13/15;
- (b) Expert disclosure to be served by 2/3/15;
- (c) Expert rebuttal to be served by 2/17/15;
- (d) Expert Discovery to be completed by 3/24/15; and
- (e) The Court shall hear dispositive motions no later than 5/4/15;

IT IS SO STIPULATED.

BERTRAND, FOX & ELLIOT

CARTER, CARTER, FRIES & GRUNSCHLAG

STIPULATION TO EXTEND DISCOVERY DEADLINES; ORDER
US District Court Case No. 3:13-cv-04512-WHO

ORDER

GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the parties' stipulation is hereby APPROVED as **modified below**.

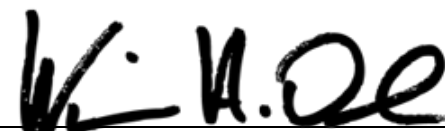
The Settlement Conference may be rescheduled as convenient to Judge James and the parties. The Case Management Conference scheduled for July 17, 2014 at 10:30 a.m. is continued to **October 14, 2014 at 2 pm**, with the expectation that the Settlement Conference will have occurred prior to October 7, 2014, when the parties shall file a Joint Settlement Conference statement updating the Court on the progress of this case.

The Court will not adjust the date for hearing dispositive motions--the date proposed by counsel is less than a month before trial and would not allow the parties to prepare meaningfully for the Pretrial Conference on May 11, 2015. However, there is no reason expert discovery cannot occur on the timetable suggested by the parties, and completion of fact discovery as proposed would occur before any dispositive motion needed to be filed. Accordingly, the revised schedule is:

- (A) Fact discovery to be completed by 1/13/15;
- (B) Expert disclosure to be served by 2/3/15;
- (C) Expert rebuttal to be served by 2/17/15;
- (D) Expert Discovery to be completed by 3/24/15;
- (E) The Court shall hear dispositive motions no later than 3/4/15.

IT IS SO ORDERED.

Dated: June 12, 2014



WILLIAM H. ORRICK

United States District Court Judge